

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE No.** 24cr60212-Dimitrouleas/Hunt

**18 U.S.C. § 554**

**18 U.S.C. § 981(a)(1)(C)**

**FILED BY AR D.C.**

**Nov 4, 2024**

**ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - FTL**

**UNITED STATES OF AMERICA**

**vs.**

**VIDESH CHANDOO,**

**Defendant.**

**INFORMATION**

The United States Attorney charges that:

**COUNT 1**

**Smuggling of Goods from the United States**

**(18 U.S.C. § 554)**

On or about June 6, 2023, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**VIDESH CHANDOO,**

did fraudulently and knowingly export and send, and attempt to export and send, from the United States to a place outside thereof, that is, Trinidad and Tobago, any merchandise, article and object, that is, firearms and ammunition, and did conceal and facilitate the transportation and concealment of such merchandise, article and object, prior to exportation, knowing the same to be intended for exportation, contrary to any law and regulation of the United States, that is, Title 18, United States Code, Sections 922(e) and 924(a)(1)(D); in violation of Title 18, United States Code, Sections 554 and 2.

It is further alleged that the firearms are:

- (a) One Taurus, Model: G3, 9 millimeter pistol, bearing serial number ADG431633;
- (b) One Taurus, Model: G3, 9 millimeter pistol, bearing serial number ADG438194;
- (c) One Taurus, Model: G3C, 9 millimeter pistol, bearing serial number AEB045453;
- (d) One Taurus, Model: G3C, 9 millimeter pistol, bearing serial number ADA844831;
- (e) One Ruger, Model: Max 9, 9 millimeter pistol, with a serial number removed;
- (f) One Ruger, Model: Max 9, 9 millimeter pistol, with a serial number removed; and
- (g) One Glock, Model: 43, 9 millimeter pistol, bearing serial number AGUH702.

It is further alleged that the ammunition is:

- (a) 182 rounds of 12 gauge ammunition;
- (b) 2,860 rounds of 9 millimeter ammunition;
- (c) 760 rounds of .38 caliber ammunition;
- (d) 400 rounds of 7.62 caliber ammunition;
- (e) 100 rounds of .22 caliber ammunition; and
- (f) 30 rounds of .40 caliber ammunition.

#### **FORFEITURE ALLEGATIONS**

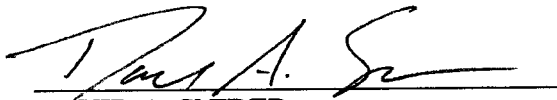
1. The allegations contained in this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America certain property in which the defendant, **VIDESH CHANDOO**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 554, as alleged in this Information, the defendant shall forfeit to the United States of America any property,

real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as made applicable by Title 28, United States Code, Section 2461(c).

  
FOR BRUCE O. BROWN  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

  
DAVID A. SNIDER  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: \_\_\_\_\_

v.

**CERTIFICATE OF TRIAL ATTORNEY**

VIDESH CHANDOO,

\_\_\_\_\_  
Defendant.

Court Division (select one)

- ☐ Miami      ☐ Key West      ☐ FTP  
☒ FTL      ☐ WPB

**Superseding Case Information:**

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of new counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect: \_\_\_\_\_
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one)	(Check only one)
I <input checked="" type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No. \_\_\_\_\_
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of N/A
10. Defendant(s) in state custody as of N/A
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
16. Did this matter involve the participation of or consultation with now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

By: \_\_\_\_\_

DAVID A. SNIDER

Assistant United States Attorney

Court ID No. A5502260

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**PENALTY SHEET**

**Defendant's Name:** VIDESH CHANDOO

**Case No:** \_\_\_\_\_

**Count #:** 1

Smuggling of Goods from the United States

Title 18, United States Code, Section 554

**\* Max. Term of Imprisonment:** 10 Years

**\* Max. Supervised Release:** 3 years

**\* Max. Fine:** \$250,000

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

AO 455 (Rev. 01/09) Waiver of an Indictment

---

---

UNITED STATES DISTRICT COURT

for the

Southern District of Florida



United States of America

v.

VIDESH CHANDOO,

*Defendant*

)  
)  
)  
)  
)

Case No. 24cr60212-Dimitrouleas/Hunt

**WAIVER OF AN INDICTMENT**

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

HOWARD SCHUMACHER, ESQ.

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

\_\_\_\_\_  
*Judge's printed name and title*